IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§	
Plaintiffs,	§ § 8	
v.	8 §	Consolidated Case
THE STATE OF TEXAS, et al.,	§ No: 5:21-cv-00844-XR	
Defendants.	§ §	
	§	

DEFENDANT LISA WISE'S DESIGNATION OF POTENTIAL TESTIFYING EXPERTS

Pursuant to the Court's June 8, 2022 Amended Scheduling Order (ECF No. 437), Defendant Lisa Wise, by and through her undersigned attorneys, hereby submits this Designation of Potential Testifying Experts. Defendant Wise reserves the right to designate and call additional or different witnesses based upon further discovery, any Court pretrial rulings, or evidence presented at trial, including rebuttal witnesses. Defendant Wise further reserves the right to call any witnesses identified by Plaintiffs, Intervenors, or Co-Defendants on any of their potential or final witness lists.

I. Potential Testifying Experts

Jed Untereker Christina Sanchez Erica Rosales El Paso County Attorney's Office 500 E. San Antonio El Paso, TX 79901 (915) 546-2000

Ranjana Natarajan States United Democracy Center 1801 E 51st St., Suite 365, No. 334 Austin, TX 78723 (323) 422-8578

Kathleen Hartnett Cooley LLP 3 Embarcadero Center, 20th Floor San Francisco, CA 94111-4004 (415) 693-2000

Orion Armon Cooley LLP 1144 15th Street Suite 2300 Denver, CO 80202-2686 (720) 566-4000

Mr. Untereker, Ms. Sanchez, Ms. Rosales, Ms. Natarajan, Ms. Hartnett, and Mr. Armon may present testimony regarding attorneys' fees in this matter. Defendant Wise also reserves the right to call any witnesses on Plaintiffs', Intervenors', or Co-Defendants' witness lists or offered by Plaintiffs, Intervenors, or Co-Defendants.

The parties have not yet completed discovery in this case. Defendant Wise therefore reserves the right to supplement this Designation pursuant to the Court's Amended Scheduling Order and the Federal Rules of Civil Procedure if additional witnesses and/or documents are identified during discovery.

Dated: February 10, 2023. Respectfully submitted,

/s/ Orion Armon

Orion Armon (CO SBN 34923)

COOLEY LLP

1144 15th Street, Suite 2300 Denver, CO 80202-2686 Telephone: +1 720 566-4000 Facsimile: +1 720 566-4099 oarmon@cooley.com

COOLEY LLP

Kathleen Hartnett* (CA SBN 314267) khartnett@cooley.com
Beatriz Mejia* (CA SBN 190948) bmejia@cooley.com
Sharon Song* (CA SBN 313535) ssong@cooley.com
Kelsey Spector* (CA SBN 321488) kspector@cooley.com
David Louk* (CA SBN 304654) dlouk@cooley.com
Caroline A. Lebel* (CA SBN 340067) clebel@cooley.com

3 Embarcadero Center, 20th Floor San Francisco, CA 94111-4004 Telephone: +1 415 693-2000 Facsimile: +1 415 693-2222

COOLEY LLP

Germaine Habell* (CA SBN 333090) ghabell@cooley.com
Wells Fargo Center, South Tower
355 South Grand Avenue, Suite 900
Los Angeles, CA 90071-1560
Telephone: + 1 858 550-6196
Facsimile: + 1 213 561-3244

STATES UNITED DEMOCRACY CENTER

Christine P. Sun* (CA SBN 218701) 3749 Buchanan St., No. 475165 San Francisco, CA 94147-3103 Telephone: +1 615 574-9108 christine@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER

Ranjana Natarajan (TX SBN 24071013) 1801 E 51st St., Suite 365, No. 334 Austin, TX 78723

Telephone: +1 323 422-8578

ranjana@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER

Marina Eisner* (DC SBN 1005593) 1101 17 Street NW Washington, DC 20036 Telephone: +1 240 600-1316 marina@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER

Robert Cotter* (IL SBN 6334375) 7510 N. Greenview Ave., Apt. #3 Chicago, IL 60626 Telephone: +1 224 235-2606 robert@statesuniteddemocracy.org

Attorneys for Lisa Wise, in her official capacity as the El Paso County Elections Administrator

^{*}Admitted pro hac vice

CERTIFICATE OF SERVICE

I certify that on February 10, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Orion Armon
Orion Armon